Comments to the Federal Communications Commission
Docket #23-120
October 29, 2023

Commission members and professional staff:

I write in opposition to the proposed action that changes Amateur Radio’s secondary allocation in the 60-meter band. Since gaining this secondary allocation, 60-meters has become an invaluable asset to Amateur Radio operators who provide emergency communications (EMCOMMS) through numerous organizations, including the Amateur Radio Emergency Services (ARES), Radio Amateur Civil Emergency Services (RACES), and FEMA’s Auxcomm program. The move to condense our allocation into a 15 KHz segment, and drastically reduce transmit power level, would eliminate this band as a viable resource for skywave (“skip”) and near-vertical incidence skywave (NVIS) propagation during tests and drills, but most importantly, during disaster relief and inter-agency coordination activities during a crisis event.

One might suggest that the 75/80-meter band could be utilized as a 60-meter band replacement for regional emergency communications. Unfortunately, there are significant challenges that prevent this band from being suitable. Indeed, propagation during the evening and nighttime hours can be conducive for reliable regional emergency communications, however this band is exceptionally busy with stations across the country and beyond during this timeframe and “wedging” a network into such a busy environment would be quite difficult. However, the real challenge on 75/80-meters comes from poor propagation during daylight hours, attributed to D-layer ionospheric absorption caused by the Sun every day, in addition to significant periods of solar activity including flares, coronal mass ejections, and coronal hole high-speed streams. These phenomena almost always negatively affect the 75/80-meter band more consistently than 60-meters. In fact, it is not uncommon for statewide public service nets on 75/80-meters to move communications to the 60-meter band to continue their network operations due to these solar conditions.

In addition, I must point out that EMCOMM/AUXCOMM operators across the U.S. have demonstrated effective interoperability on the 60-meter band with the government’s Military Affiliate Radio System (MARS). Amateur Radio operators frequently communicate with MARS stations during every interoperability drill conducted, and it only helps to support the unique and irreplaceable character of the Amateur Radio secondary allocation on 60-meters.

It’s important to note that in 2022 our neighbor, Canada, enacted ARRL’s position by keeping the five current channels AND adding the expanded 15 KHz of continuous spectrum, all at 100 watts. Monroe County Amateur Radio Public Service Corps and myself, are advocating for the FCC to adopt the identical allocations and power limits which Canada put in place over a year ago.

I believe any arguments I could make as to the importance of maintaining the transmit power level at 100 Watts EIRP for emergency communications would be rhetorical. If the permitted transmit power is reduced to 1/10 of the current level on the 60-meter band, most of the NVIS and skywave signal strength would be easily defeated by noise and/or fading, making the band useless for reliable statewide or regional emergency communications. Only short distance groundwave propagation could be maintained, thereby removing this band as a viable resource for state or regional EMCOMM/AUXCOMM operations.

Accordingly, I sincerely hope that the Federal Communications Commission will reject any proposed rulemaking that changes the current Amateur Radio secondary allocation on 60-meters, with five designated channels and an RF output power of 100 Watts EIRP.

Thank you for your attention,

Lance Charter KE8BYC
Monroe County Michigan
Amateur Radio Public Service Corps
County Emergency Coordinator/Radio Officer
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